

UNITED STATES BANKRUPTCY COURT

FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division

In the Matter of:

THERESA Z CORBETT

Debtor

Chapter 13

Case No. 24-11952-BFK

**OBJECTION TO CONFIRMATION OF MODIFIED PLAN,**  
**NOTICE OF OBJECTION TO CONFIRMATION OF MODIFIED PLAN**  
**AND**  
**NOTICE OF SCHEDULED HEARING ON THIS OBJECTION**

Thomas P. Gorman, Chapter 13 Trustee, has filed this objection to confirmation of your Chapter 13 Modified Plan filed February 3, 2025. The cause for this objection is as follows:

**Violation of 11 U.S.C. §1325(a)(6) – Feasibility –**

- 1) Plan calls for Debtor's property to remain vested in the estate until discharge, including her motor vehicle. Debtor should be required to provide verification of timely payment of the budgeted vehicle tax and insurance payments to Trustee during Plan term.
- 2) Plan is underfunded as follows at advertised percentage:

**PERFORMANCE:**

Amount of Plan Payment	697.00	797.00
Number of Months	3	9
	2,091.00	7,173.00
<b>Total Receipts</b>	897.00x12	58,320.00
	997.00x12	
	1,097.00x24	
<b>Disbursements Required:</b>		
Attorney	5,950.00	
Taxes-Other Priority	0.00	
Secured	0.00	
Unsecured	59,371.52	160,463.56x37%
Other	0.00	
Trustee	5,832.00	10%
<b>Total Disbursement</b>		71,153.52

**Notice of Objection To Confirmation**

Theresa Z Corbett, Case # 24-11952-BFK

**Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)**

If you do not wish the court to grant the relief sought in the objection, or if you want the court to consider your views on the objection, then on or before five business days prior to the hearing date, you or your attorney must:

File with the court a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1. Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing. If you mail your response to the court for filing, you must mail it early enough so the court will receive it on or before twenty-one days from the service of this notice. You must mail a copy to the persons listed below.

***Attend the hearing to be held on March 6, 2025 at 1:30 p.m. in Courtroom #1 on the 2<sup>nd</sup> floor, United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314.*** If no timely response has been filed opposing the relief requested, the court may grant the relief without holding a hearing.

A copy of any written response must be mailed to the following persons:

Thomas P. Gorman  
1414 Prince Street, Suite 202  
Alexandria, VA 22314

Clerk of the Court  
United States Bankruptcy Court  
200 South Washington Street  
Alexandria, VA 22314

If you or your attorney do not take steps, the court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

Date: February 20, 2025

/s/ Thomas P. Gorman  
Thomas P. Gorman  
Chapter 13 Trustee  
1414 Prince Street, Suite 202  
Alexandria, VA 22314  
(703) 836-2226  
VSB 26421

**Notice of Objection To Confirmation**

Theresa Z Corbett, Case # 24-11952-BFK

**CERTIFICATE OF SERVICE**

I hereby certify that I have this 20<sup>th</sup> day of February, 2025, served via ECF authorized users or mailed a true copy of the foregoing Objection to Confirmation, Notice of Objection and Notice of Hearing to the following parties.

Theresa Z Corbett  
Chapter 13 Debtor  
750 Thornton Way  
Apt 508s  
Alexandria, VA 22314

Daniel M. Press, Esquire  
Attorney for Debtor  
Chung & Press, P.C.  
6718 Whittier Ave. Ste. 200  
McLean, VA 22101

/s/ Thomas P. Gorman  
Thomas P. Gorman